

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

R'KES STARLING, individually and on
behalf of all others similarly situated

Plaintiff,

v.

PR ADVISORS, LLC D/B/A PINNACLE
REALTY ADVISORS and
RAM PROPERTIES, LLC

Defendants.

Civil Action No. 1:24-cv-000991-DII

**DEFENDANT RAM PROPERTIES, LLC'S MOTION FOR PROTECTIVE ORDER
TO TEMPORARILY STAY OR BIFURCATE DISCOVERY THROUGH JOINDER
WITH AND THE ADOPTION OF DEFENDANT PR ADVISORS, LLC'S
MOTION FOR PROTECTIVE ORDER TO TEMPORARILY STAY
OR BIFURCATE DISCOVERY ("MOTION")**

For the same reasons set forth in Defendant PR Advisors, LLC's Motion (*see* Dkt. 29), Defendant RAM Properties, LLC ("RAM") hereby moves for a protective order to (i) temporarily stay all discovery in the above-captioned matter, until such time that the Court rules on the Defendants' pending dispositive motion (*see* Dkts. 11 and 14, "Motions to Dismiss"), or (ii) alternatively, bifurcate discovery between Plaintiff's individual and the putative class members' claims, all for the sake of judicial and party economy:

I. JOINDER WITH AND ADOPTION OF PR ADVISORS, LLC'S MOTION

On behalf of the "National Do Not Call Registry Class," Plaintiff makes the same allegations and asserts the same claim against Defendants RAM and PR Advisors, LLC for alleged violations of the Telephone Consumer Protection Act. On this day, February 24, 2025, Defendant PR Advisors, LLC filed its Motion for Protective Order to Temporarily Stay Discovery or

Bifurcate Discovery pursuant to Rule 26(c) of the Federal Rules of Civil Procedure. Because the Defendants are similarly situated, RAM hereby joins and adopts PR Advisors' Motion in its entirety and incorporates it fully into this motion by reference. Fed. R. Civ. P. 10.

II. GROUNDS FOR PROTECTIVE ORDER

The same incurable defects in the Complaint urged by PR Advisors, LLC are equally applicable to RAM. Thus, for the sake of judicial and party economy and all of the other reasons provided in PR Advisors' Motion, the Court should either (1) temporarily stay all discovery in the above-captioned matter until the Court rules on the Defendants' pending Motions to Dismiss, or (ii) alternatively, bifurcate discovery between Plaintiff's individual and the putative class members' claims.

WHEREFORE, PREMISES CONSIDERED, Defendant RAM prays that this Court grants this motion and all other and further relief to which RAM may show itself entitled, whether at law or in equity.

Dated: February 24, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was served this 24th day of February 2025 to all parties via PACER.

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